

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANTONIO SOLIS et al.,)	
)	
Plaintiffs,)	
)	Case No. 1:20-cv-02348
v.)	
)	Magistrate Judge Young B. Kim
HILCO REDEVELOPMENT LLC et al.,)	
)	
Defendants.)	

DECLARATION IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL

1. I am an attorney admitted to practice before this Court and am providing this Declaration in support of Plaintiffs' Motion for Final Approval of the Class Action Settlement in this case.

2. I am a partner at Loevy & Loevy. I served as one of the lead lawyers in this case, which my firm brought on behalf of Little Village residents Antonio Solis, Jose Solis, and Juan Solis against Hilco Redevelopment, LLC, HRE Crawford, LLC, HRP Exchange 55, LLC (collectively "Hilco"), MCM Management Corp. ("MCM"), Controlled Demolition, Inc. ("CDI"), and Marine Technology Solutions LLC ("MTS").

3. I submit this declaration as a supplement to the declaration that I submitted in support of Plaintiffs' Motion for Attorney's Fees, Incentive Awards, and Expenses. Dkt. 255-1. That declaration addresses Loevy & Loevy's experience in general and the experience of the specific attorneys assigned to this case, as well as the litigation and settlement of the case. This declaration serves as a supplement to describe our firm's continued efforts on behalf of Class Members.

4. Since the Court preliminarily approved the Settlement, our firm has continued to devote significant resources to this case. In particular, we have worked with Settlement

Administrator Simpluris, Inc. to help carry out the notice plan, and we have worked with Class Members and community groups to help educate Class Members about the Settlement. These efforts include, but are not limited to: (a) an in-person training session organized by the local alderman's office where volunteers from the community received information on the claims-filing process so that they could help other community members file claims; (b) two remote video town halls organized by the Little Village Environmental Justice Organization, a group dedicated to advocating for environmental justice in Little Village; and (c) an in-person claims filing event organized by Juan Rangel and staffed by Class Counsel, the Settlement Administrator, and certified translators, during which hundreds of individuals filed claims.

5. Mr. Rangel has continued to go above and beyond in his efforts to communicate with community members about the settlement, both participating in media interviews and in organizing and attending the claims-filing event referenced above.

6. As discussed in more detail in my declaration in support of Plaintiffs' Motion for Attorney's Fees, Incentive Awards, and Expenses, our firm was well-positioned to evaluate whether the mediator's proposal made by Judge Andersen represented a fair and reasonable settlement. Dkt. 255-1. This was based both on our firm's prior experience litigating and trying class actions and other complex litigation, and on our analysis of the facts and legal issues in this particular case. *Id.* The reaction of the Class to this Settlement confirms our opinion that the Settlement is fair and reasonable. Specifically, tens of thousands of people filed valid claims; no one objected; and only thirteen individuals out of an estimated class size of 70,000 – 100,000 people excluded themselves from the lawsuit.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on April 15, 2024

/s/ Scott Rauscher
Scott Rauscher